

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

vs.

CASE NO.: 3:18-cr-89-J-34JRK

REGINALD BROWN

_____ /

**DEFENDANT REGINALD BROWN'S MOTION
FOR HEARING TO REVIEW STATUS OF COUNSEL AND MEMORANDUM OF LAW**

The Defendant, Reginald Brown, by and through undersigned counsel, pursuant to the Sixth Amendment to the United States Constitution, Rules 12(b) and Rule 44 of the Federal Rules of Criminal Procedure and Local Rule 2.03 (Middle District of Florida), hereby moves the Court conduct a hearing to review the status of counsel. The grounds for this motion are as follows:

1. Mr. Brown wants a new lawyer.
2. He moves the Court schedule a hearing to consider the reasons for his request.
3. Mr. Brown is indigent for purposes of counsel and costs.
4. Mr. Brown requested counsel file this motion and was provided a copy after it was filed electronically.

MEMORANDUM OF LAW

The Sixth Amendment of the United States Constitution, with some limitations, provides citizens with the choice of counsel. It requires effective assistance of counsel, which includes conflict-free counsel.

Mr. Brown believes a conflict exists.

Local Rule 2.03 (Middle District of Florida) provides that no attorney shall withdraw as counsel without approval of the Court and notice to the defendant. A trial court's decision to release counsel is an exercise of its discretion, *United States v. Williams*, 717 F. 2d 473, 475 (9th Cir. 1983).

WHEREFORE, the Defendant, Reginald Brown, for the above-mentioned reasons, respectfully moves this Honorable Court grant this motion.

S:// Thomas M. Bell

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December __, 2019, I electronically filed the foregoing with the clerk of the Court by using CM/ECF system which will send a notice of electronic filing to A. Tysen Duva, AUSA, Michael Coolican, AUSA, and Richard Landes, Esq and to Katrina Brown at Bbrowncato1122@gmail.com.

S:// Thomas M. Bell

THOMAS M. BELL